

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WISCONSIN  
MADISON DIVISION

REFUGIO CELAYA, )  
DONNA CHARNEY, DAHL WILLIS, )  
SHELLEY WILLIS, and CAROLYN )  
WOOD, individually and on behalf )  
of others similarly situated, )  
Plaintiffs, ) Case No.: 3:20-cv-01002-jdp  
v. )  
AMERICAN FAMILY MUTUAL INSURANCE )  
COMPANY, S.I. and AMERICAN FAMILY )  
INSURANCE COMPANY )  
Defendants. )

**JOINT NOTICE REGARDING SETTLEMENT DISCUSSIONS**

The parties jointly provide this notice regarding pending settlement discussions:

1. For several months, the parties have been engaged in informal discussions that could potentially resolve this matter. On November 4, 2024, the parties decided to engage in formal in-person mediation with Michael Ungar of UB Greensfelder, who has successfully mediated multiple cases that are similar to the present one.
2. During the full-day mediation earlier this week, the parties reached an agreement in principle on certain material aspects of settlement.
3. The parties are continuing to discuss remaining open issues with the Mediator, and they propose to notify the Court in 30 days regarding the status of negotiations.

WHEREFORE, the parties respectfully advise the Court that they will provide a status of settlement discussions by December 9, 2024.

Dated: November 7, 2024

Respectfully submitted,

/s/ Erik D. Peterson (with permission)

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